

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

JESSICA HICKLIN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 4:16-cv-01357-NCC
	)	
ANNE PRECYTHE, <i>et. al.</i> ,	)	
	)	
Defendants.	)	

**MOTION TO TERMINATE  
PROSPECTIVE RELIEF**

Defendants Anne Precythe, Joan Reinkemeyer, Latoya Duckworth, Scott O’Kelly, Ian Wallace, Deloise Williams, Cindy Griffith, and Stan Payne (“MDOC Defendants”), respectfully move this Court to terminate the prospective relief granted in the Court’s Memorandum and Order and Permanent Injunction (“Permanent Injunction”) (Doc. 176), pursuant to 18 U.S.C. § 3626(b)(2). MDOC Defendants incorporate herein their Suggestions in Support of this Motion, which are filed separately.

MDOC Defendants respectfully request oral argument on this Motion to Terminate Prospective Relief.

Respectfully submitted,

**ERIC S. SCHMITT**

Attorney General

/s/ Jeremiah J. Morgan

Jeremiah J. Morgan, Mo. Bar #50387

Deputy Attorney General - Civil

P.O. Box 899

Jefferson City, MO 65102-0899

Telephone No.: (573) 751-1800

Facsimile No: (573) 751-0774

E-mail: Jeremiah.Morgan@ago.mo.gov

Robert J. Schaeffer, Mo. Bar #69324

Assistant Attorney General

149 Park Central Square

Suite 1017

Springfield, MO 65806

Telephone No.: (417) 895-6567

Facsimile No: (417) 895-6382

E-mail: Robert.Schaeffer@ago.mo.gov

**Attorneys for Defendants**

**CERTIFICATE OF SERVICE**

I certify that on this 14<sup>th</sup> day of July, 2021, the foregoing was filed and served through the Court's CM/ECF system upon all counsel of record.

/s/ Jeremiah J. Morgan

Jeremiah J. Morgan